

## **OBSERVATION REPORT #97**

**KPMG observed that Bell Atlantic's documented Methods and Procedures (M&Ps<sup>1</sup>) and actual coordinated hot-cut practices are inconsistent.**

### **Issue 97.1**

Bell Atlantic's Regional CLEC Control Center (RCCC) representatives did not place a pre-cut call to the Main Distribution Frame (MDF) within the timeframe prescribed by Bell Atlantic's coordinated hot-cut M&Ps (Frame Due Time minus 15 minutes or FDT-15) for any of the coordinated hot-cuts observed by KPMG<sup>2</sup>. In one instance, (Somerville CO) the frame technician stated that the RCCC had called early in the morning and gave the go ahead for a 1:00 PM FDT.

### **Issue 97.2**

In cases where the RCCC does not place a call to the MDF within the prescribed time limits, Bell Atlantic's coordinated hot-cut M&P's specify that the MDF technician should call the RCCC at FDT-15 to confirm the go ahead. KPMG did not observe an MDF technician initiate an FDT-15 call to the RCCC to confirm the go ahead on any of the hot-cuts observed.

### **Issue 97.3**

On a one-line hot-cut observed by KPMG at the Somerville CO, the idle line test and ANAC-2 test were not performed prior to the CO/CI as prescribed in Bell Atlantic's M&Ps.

### **Issue 97.4**

KPMG observed that the reference guide used by frame technicians at all observed locations, "MDF Job Aid", does not have a document number or any other means to associate it with any particular version or issue of the M&Ps in use. In addition, the "MDF Job Aid" procedures did not accurately reflect procedures defined in the M&Ps in use in the CO or the M&P "Job Aid for UNE Migration Hot Cuts" (Doc. No.: F9812-01 Issue: F Dated: 12-14-98) provided to KPMG as the Bell Atlantic standard. For example, the following "MDF Job Aid" statement was noted, "Do not hold up cut if the line is in use, unless a 911 call." There is no reference within the M&Ps provided to KPMG or those reviewed in the field requiring a technician to monitor a line to determine the nature of a call. The M&P documents simply state "perform an idle line test prior to ANAC".

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<sup>1</sup> Bell Atlantic provided KPMG with their UNE migration M&P "Job Aid for UNE Migration Hot Cuts" (Doc. No.: F9812-01 Issue: F Dated: 12-14-98). This document was represented to KPMG as the standard by which all UNE migration hot cuts should be performed at Bell Atlantic.

<sup>2</sup> Although KPMG observers arrived at least an hour prior to the scheduled hot cuts, there were no observations of an RCCC call prior to the FDT.

**Issue 97.5**

A review of the available M&Ps indicated inconsistencies in procedures between documents. For example, the M&P “Large Job Hot Cut Frame Process Checklist” (Doc. No. NOCIL 0005-005 Issue # A, Date 05/09/2000) states “Perform final Dial Tone check and ANAC through the protector.” The “UNE Hot Cut – Checklist” in use at the field locations visited, and the M&P “Job Aid for UNE Migration Hot Cuts” (Doc. No.: F9812-01 Issue: F Dated: 12-14-98) step 5 state, “Provide final ANAC test at the protector.” KPMG observed some technicians ANAC the line through the protectors while others verified dial tone at the cable block.

**Assessment**

Inconsistent adherence to the documented methods and procedures for performing coordinated hot-cuts could decrease a CLEC’s ability to plan and uphold service commitments to their customers and lead to decreased customer satisfaction (subscriber and CLEC) and increased operational costs for both companies.